



LOUIS V. FASULO *
MARGARET M. SHALLEY
CHARLES DI MAGGIO
*ADMITTED NJ

June 1, 2012

VIA ECF AND FIRST CLASS MAIL

The Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *United States v. Giovanni Galluzzo*
11 Cr. 030-21 (KAM)**

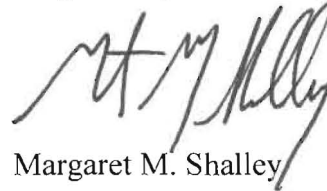
Dear Judge Matsumoto:

I represent the defendant, Giovanni Galluzzo, in the above referenced case. This letter is respectfully submitted to update the Court on recent events regarding Mr Galluzzo's designation to a Bureau of Prisons ("BOP") site. This afternoon, my office received a phone call from the United States Marshal Service for the Eastern District of New York at approximately 3 p.m. We were informed that Mr. Galluzzo was designated to Fort Dix and was expected to surrender yesterday, May 31. This was unexpected news since both my associate and I had contacted the EDNY Marshal Service independently, and were told that the individuals who could provide information with respect to designation were out of the office. As recently as Tuesday this week, The Marshal's Office informed my associate that the Marshal responsible for BOP designation was not expected to return until the end of this week. At no point was defense counsel told that Mr. Galluzzo had been designated to Fort Dix. Accordingly, it was counsel's belief that Mr. Galluzzo had not, in fact, been designated, which prompted our May 29 letter to the Court seeking an extension of the surrender date, which the Court granted.

Now that Mr. Galluzzo's designation status is certain, the defense respectfully requests that his time to surrender be extended to June 8, 2012. Given that this news was unexpected, the defendant respectfully requests a week to be sure that his affairs are in order prior to surrender.

The Court's time and consideration of this matter is greatly appreciated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Shalley', is written over the printed name.

Margaret M. Shalley